



## Current Air Quality Conformity Impacts on the San Joaquin Valley

**Current (FY 25/26) Impact: \$2.1B**  
**Long-Term (2026+) Impact: \$4.6B**

Metropolitan Planning Organizations are responsible for investing in transportation projects that optimize safety and mobility, while conforming to the applicable State Implementation Plans, which ensures that their actions do not interfere with the state's ability to achieve and maintain air quality standards established under the federal Clean Air Act. Complying with these Clean Air Act requirements is referred to as "Transportation Conformity." This conformity process is responsible for an 80% improvement in air quality in our Valley since 1990.

### The Issue:

- On June 12, 2025, President Trump signed three Congressional Review Act (CRA) Resolutions, which effectively rescinded California's waivers to regulate emissions from mobile sources in the state.
- The CRA resolutions affect California's EMFAC2021 model, the federally approved tool used to estimate future year emissions from the transportation sector – effectively making it invalid for use. This forces the Valley into a "conformity lockdown," where Transportation Conformity cannot be demonstrated.

### Impact on Project Delivery:

- Transportation Conformity is required to amend regionally significant projects and plans, and to proceed with certain project-level conformity analyses. **Currently, the Valley is unable to demonstrate conformity, which results in delays and potential loss of funding for critical projects seeking to proceed over the next three years.**
- Transportation Conformity is also required to adopt Regional Transportation Plans (RTP). In the Valley, RTPs are set to be adopted in the Summer of 2026. Should the "conformity lockdown" continue through 2026, the Valley will be unable to adopt their RTPs. **This creates a long-term impact where failure to demonstrate conformity results in an inability to consider any new projects, make changes to existing projects, and creates delays and potential loss of funding for regionally significant projects.**

### Sampling of At-Risk Projects:

**Fresno County:** \$188M  
S. Fresno SR 99 Corridor

**Kern County:** \$78M  
Centennial Corridor

**Kings County:** \$64M  
SR 198 / 9<sup>th</sup> Ave Interchange

**Madera County:** \$338M  
SR 99 Madera 6-Lane N/S

**Merced County:** \$99M  
Atwater-Merced Expressway

**San Joaquin County:** \$41M  
Corral Hollow Road

**Stanislaus County:** \$134M  
SR 99 / Mitchell Rd Interchange

**Tulare County:** \$238M  
SR 99 Safety & Goods Movement

### The Valley's Request to Address Project Delivery Challenges:

- Given that federal approvals of technical solutions will take an extended period of time, the Valley recommends the implementation of a **two-year period** to provide either:
  - a grace period, during which MPOs can continue demonstrating conformity under old rules; or
  - regulatory relief from transportation conformity requirements to allow infrastructure investments to proceed while the State adjusts to the new regulatory environment.



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### Graphical / Technical Summary:

A graphical summary of how the California waiver rescission impacts the State Implementation Plan (SIP) approval process and the required conformity analyses for transportation plans is shown below.

